

**DOCKET SECTION**

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POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

**MOTION FOR LATE ACCEPTANCE OF  
THE REPLY OF THE UNITED STATES POSTAL SERVICE TO PARTS OF  
DAVID POPKIN MOTION TO COMPEL RESPONSES TO INTERROGATORIES**  
(October 17, 1997)

The United States Postal Service hereby moves for late acceptance of its reply to portions of the October 7, 1997, motion of David Popkin seeking to compel responses to certain interrogatories. The reply to that motion to compel was due to have been filed on Tuesday, October 14, 1997. Undersigned counsel was in the hearing room all day on the 8th and 9th, working late in the office on hearing room related matters or other motion practice late into each evening. Counsel was out-of-town from the morning of the 10th through the afternoon of the 14th, tending to an individual who underwent reconstructive knee surgery on the afternoon of the 10th.

Because of the press of other rate case related issues and filings, it was not until yesterday afternoon that counsel could turn his undivided attention to Mr. Popkin's motion. Accordingly, the reply to that motion could not be prepared until today.

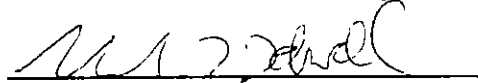
The Postal Service believes that no party will be prejudiced by the filing three days late.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

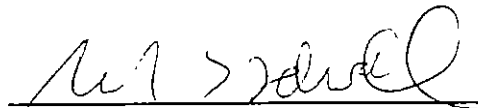
Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

A handwritten signature in dark ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in dark ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
October 17, 1997